ATTACHMENT A

REMARKS

Claims 1-22 have been rejected under 35 USC 103(a) as being "unpatentable over Nielsen, US Pat. No. 6,108,688, in view of Knowles et al., US Pat. No. 5,905,863." This rejection is respectfully traversed.

It is noted that the Nielsen and Knowles et al patents were cited by the applicant in the Information Disclosure Statement filed on December 26, 2000. As discussed below, while these patents are broadly relevant to the present invention in that they relate to email messaging, the two patents address different problems from that addressed by the present invention and, moreover, the problems disclosed by the two patents are different from each other. For the reasons set forth hereinbelow, it is respectfully submitted that the claims presented are patentable over the Nielsen and Knowles et al patents.

In common with the references, the present invention deals with the problems presented by the high volumes of electronic mail messages normally received by an electronic mailbox user. The present invention is particularly concerned with situations wherein electronic messages build up and form a large backlog such that, as the user works through these messages, he or she may reply to one of them, only to find out that a later, as yet-unnoticed message from the original sender, or from another recipient of the original message, made it unnecessary to reply. For example, as described in the introductory portion of this application, an electronic mail user that has been on vacation may reply to a message requesting certain information only to find out that another member of his or her department has already provided the information and sent it out to all the recipients of the original message. Thus, when a user has a large backlog of electronic mail messages, time may be wasted in replying to messages because, as it turns out, such a reply is actually unnecessary.

The primary reference, the Nielsen patent, deals with a much different problem and specifically concerns a system for reminding a sender of an email if the recipient of the email does not respond by a selected time set by the sender. The system permits the sender of a message to designate whether the sender wishes to be warned in case the message is not opened by the recipient prior to a time and date specified by the sender. The system automatically monitors incoming messages and updates a database of such messages as responses are received from message recipients. If a response is not received from a recipient prior to the specified

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date, the system generates a warning message to the sender. Thus, again, it is respectfully submitted that a system for warning the sender of email messages when replies to the messages are not received basically has nothing to do with, and has no application to, the problem of correlating an electronic mail message with related (e.g., reply or forwarded) electronic mail messages by checking for reply (e.g., forwarded) messages related to the original electronic mail message and received by the user after receipt of the original message.

The secondary reference, the Knowles et al patent, is concerned with finding an email message to which another email message is responsive, and is particularly concerned with using textual contexts and characteristics of messages in order to provide a more reliable and effective way to construct "message threads," wherein a "thread" is a "conversation among two or more participants carried out by exchange of messages." Statistical information retrieval techniques are used in conjunction with textual material obtained by "filtering" of messages so as to improve the level of accuracy in identifying when one messages in reply to another. It is respectfully submitted that this problem has nothing to do with the problem addressed by the primary reference, i.e., that of reminding or warning a sender of an email when the email recipient does not respond within a set time period. Accordingly, it is respectfully submitted that the combination proposed by the Examiner is necessarily the improper product of hindsight. In this regard, the Examiner contends that it "would have been obvious to one having ordinary skill in the art at the time the invention was made to have incorporated the search features as taught by Knowles, into the email system of Nielsen, for the purpose of creating an effective message threading system." However, the Nielsen patent has nothing to do with message threading and is, as set forth above, concerned instead with tracking messages that have been sent out so as to warn the sender if a recipient has not responded within a predetermined time.

Considering claim 1 for example, it is respectfully submitted that the references do not disclose a method for responding to an email message selected by a user wherein the user accesses a mailbox to store one or more electronic mail messages each having a unique identifier and identifier storage field, and wherein the method includes retrieving the unique identifier of the selected electronic email message, searching the mailbox for at least one related email message having the unique identifier of the selected message in the identifier storage field of the related message, and providing information relating to results of the searching of the mailbox step for the at least one related one email message of the character set forth. The Examiner states

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that the Nielsen patent teaches the invention "substantially as claimed" but it is respectfully submitted that, as is implicitly acknowledged by the Examiner, the Nielsen patent does not teach key features of the present invention and, as set forth above, actually relates to much different subject matter. Moreover, as described above, the Knowles et al patent relates to a different problem from that addressed and solved by the present invention and, in this regard, employs highly sophisticated information retrieval techniques for recognizing and manipulating threads contained in electronic messages. Thus, it is respectfully submitted that it would not be obvious to combine the Nielsen and Knowles et al references and that, moreover, no fair combination of these references would result in the present invention as claimed in claim 1.

Similar remarks apply to independent claims 10, 18 and 21.

It is noted that the dependent claims also set forth further features not disclosed in the references. For example, claim 15 recites that each electronic mail message further comprises a time field for storing a sent time, and that the receiving information step further comprises the step of determining which related mail message has the latest sent time in the time field. It will be appreciated that, in the example discussed above, it is important for the user to be able to determine the last sent related message so as to be able to avoid sending other replies that may have been rendered unnecessary by the last sent message.

Claim 15, and claims 16 and 17 dependent thereon, are said by the Examiner to be met by the cited patents, with particular reference being made to the Nielsen patent at column 1, line 11 to column 2, line 30 and column 3, line 8 to column 4 line 31. These lengthy passages of the Nielsen patent have been carefully reviewed but it is respectfully submitted that there is no teaching therein of the feature in question. The Nielsen patent is, of course, concerned with logging times but this is in connection with determining whether a reply has been received from a recipient of the email sent by the sender within a selected time period set by the sender and once a response has been received, the inquiry is ended. Accordingly, in the Nielsen patent, there is no provision for any comparison of sent times to determine the latest sent time since this would be unnecessary in the Nielsen system.

Allowance of the application in its present form is respectfully solicited.

END REMARKS